Continental Carbon

April 1, 2021

Via Overnight Mail

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16850 Park Row, Houston, TX 77084

Continental Carbon

Re: United States v. Continental Carbon Company, Consent Decree
(Case # 5:15-cv-00290-F) – Appendix E SO_2 Emission Study Protocol

Dear Madam/Sir:

Continental Carbon Company ("CCC") hereby submits a protocol required by Appendix E of the above-referenced Consent Decree for the SO_2 Emission Limits study at its carbon black plant in Ponca City, Oklahoma.

In Accordance with the Decree requirements, I state as follows:

> I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions, please contact Brad Stevener at (281) 647-3807 or bstevener@continentalcarbon.com.

Sincerely,

Dennis Hetu
President, Continental Carbon Company

Attachments: Protocol

cc: Sam Boxerman, Sidley Austin

16850 Park Row, Houston, TX 77084

Continental Carbon

Continental Carbon Company
Carbon Black Plant, Ponca City, Oklahoma
Consent Decree Case # 5:15-cv-00290-F
Appendix E SO_2 Emission Limit Study Protocol

Pre-Study Preparation

- Verify/Ensure proper functionality of Boiler O_2 Analyzers (91AI613A & B, 92AI613A & B).
- Confirm CEMS/DAHS functionality as per Certification Requirements.
- Confirm data collection in DCS Data Historian.
- Confirm incoming SO_2 from the boiler to the CDS (91AI1501D & 92AI1681D)
- Determine/Confirm all design criteria required for the study (e.g., AQCS System fully commissioned and functional, etc.)
- Expected control functionality and strategy to regulate SO_2 emissions, with tail gas as primary fuel, will be net lime rate into the CDS.

Phase 1 – Optimization (1st 3 Months)

- Establish Steady State Operations, with plant running at typical capacities for both boilers.
- Operate the boilers at typical O_2 levels between 3 – 4%.
- SO_2 levels will be characterized by 7-day rolling averages.
- Establish Steady State Operations for each CDS (characterized by initial lime removal rate and net lime addition).
- Observe/Record SO_2 levels with Stack CEMS (91AI1510A & 92AI1690B).
- Begin adjusting lime removal and addition in stepwise fashion, to determine the impact on SO_2 levels in the stack (91AI1510B & 92AI1690B).
- Observe/Record SO_2 levels accordingly. The intent is to find the operating conditions which minimize SO_2 emissions within a controllable range.
- Monitor and confirm the minimum controllable level maintained as characterized by 7-day rolling averages.

Phase 2 – Demonstration (Last 15 months)

- Operate the boilers and scrubbers under the optimal conditions determined in Phase 1.
- Monitor/Record appropriate data using CEMS/DAHS and DCS Data Historian.
- Demonstrate best compliance levels using this data.
- Prepare final report for EPA and ODEQ.

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